

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

VIVIAN BERT, et al.,

Plaintiffs,

VS.

AK STEEL CORPORATION,

Defendant.

CASE NO.
C-1-02-467

Deposition of: JAMES GREENWOOD

Taken: By the Plaintiffs
Pursuant to Agreement

Date: July 25, 2006

Time: Commencing at 3:11 p.m.

Place: Taft, Stettinius &
Hollister, LLP
425 Walnut Street
Suite 1800
Cincinnati, Ohio 45202

Before: Karen Volk, RPR
Notary Public - State of Ohio

ORIGINAL

1 APPEARANCES:

2 On behalf of the plaintiffs:

3 Herman N. Johnson, Jr., Esq.
4 of
5 Wiggins, Childs, Quinn & Pantazis
6 301 19th Street
The Kress Building
Birmingham, Alabama 35203

7 On behalf of the defendant:

8 Gregory Parker Rogers, Esq.
9 of
10 Taft, Stettinius & Hollister, LLP
425 Walnut Street
Suite 1800
11 Cincinnati, Ohio 45202

12 Also Present:

13 Stephanie Bisselberg
14

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I N D E X

JAMES GREENWOOD PAGE

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EXHIBITS MARKED REFERENCED

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- - -

1 JAMES GREENWOOD
2 of lawful age, a plaintiff herein, being first duly
3 sworn as hereinafter certified, was examined and
4 deposed as follows:

5 CROSS-EXAMINATION

6 BY MR. ROGERS:

7 Q. Would you please state your name for the
8 record, sir?

9 A. James Edward Greenwood.

10 Q. Where do you live, Mr. Greenwood?

11 A. 1505 Daniel Court, Middletown, Ohio.

12 Q. How long have you lived there?

13 A. Almost six years.

14 Q. What's your educational background?

15 A. High school, military, Sinclair Community
16 College and D. Russell Lee Industrial School.

17 Q. Okay. Did you graduate from high school?

18 A. Yes, I did.

19 Q. What year?

20 A. 1977.

21 Q. Which high school?

22 A. Middletown.

23 Q. When were you in the Navy?

24 A. Went into the Navy in 1983.

25 Q. How long were you in the Navy?

1 A. Four years.

2 Q. Did you receive an honorable discharge?

3 A. Yes.

4 Q. When did you attend classes at Sinclair?

5 A. Sinclair Community College, I went to
6 equality class for Square D Company. That was -- I
7 think it was in '93.

8 Q. Okay. Did you receive any sort of degree
9 from Sinclair?

10 A. No. It was just an apprenticeship in the
11 QA department.

12 Q. Was part of your classwork for your
13 apprenticeship program?

14 A. Yes.

15 Q. Then you mentioned Russell Lee?

16 A. D. Russell Lee, I took industrial --
17 industrial electrical work at D. Russell Lee.

18 Q. Was that also part of your apprenticeship
19 classroom training?

20 A. Yes.

21 Q. Have you gotten journeyman status?

22 A. Well, I've been with Square D a pretty
23 long time so I've been in the quality field,
24 electrical inspection for Square D ever since I got
25 out of the military in 1987.

1 So these are just classes that I took to
2 enhance my knowledge for my job.

3 Q. Okay. Is there a union at Square D?

4 A. At one point there was. I was in the
5 union before I went to the service. When I got back
6 out of the military, I went back to Square D. And I
7 was in the union for nine months and then I
8 transferred over to salary, I think, about 1990.

9 Q. Are you salaried today?

10 A. Yes, I am.

11 Q. How long have you worked for Square D on
12 the second go-around?

13 A. The second go-around, since '88. Being
14 going into the military, my seniority never ceased,
15 so I'm working on 29 years now.

16 Q. So when did your service date with Square
17 D -- what is the beginning of your service date?

18 A. November 1977. November 14, 1977.

19 Q. I'm sorry, I forgot, you've been salaried
20 with Square D since when?

21 A. I'm thinking 1990. 1991.

22 Q. What are your job duties today?

23 A. I'm the quality manager for station
24 breaker.

25 Q. What was your -- what do you do in that

1 job?

2 A. Well, what I'm doing now is I'm
3 supervising eight electrical technicians. I have
4 five electrical inspectors and I have four --
5 three physical inspectors that's not really involved
6 in a lot of electrical but they do the physical
7 aspects.

8 I manage their time. I take the job lists
9 and what needs to be done. I do some baratal
10 (phonetic) charts. I look at the quality aspects of
11 the breaker, make the decisions on the customer
12 itself to make sure that their needs are met. Take
13 the customer specs, take a look at them, make sure
14 our breaker is to the customer specs.

15 Q. Where is the Square D facility where you
16 work?

17 A. West Chester.

18 Q. How long have you worked at that West
19 Chester facility?

20 A. A little over three years.

21 Q. Did you work in the Middletown --

22 A. Yes.

23 Q. Square D closed that Middletown location?

24 A. Exactly.

25 Q. What was your job with Square D in

1 September of 2001?

2 A. I was an electrical inspector for the QA
3 department.

4 Q. So would that be a step or two below where
5 you are today?

6 A. That is -- yes, step below.

7 Q. When did you receive the promotion to your
8 current job?

9 A. It's been less than a year.

10 Q. What's your annual salary with Square D?

11 A. \$54,000.

12 Q. And do you receive any sort of annual --
13 any other compensation beyond the annual salary?

14 A. Just this past year, just one.

15 Q. And what was that?

16 A. That was \$1,500 for a job well done on a
17 few product lines that we brought to West Chester
18 where I am working now.

19 Q. What does Square D make out at the West
20 Chester facility?

21 A. Square D basically -- like I say, within
22 the last year we transferred a station breaker where
23 we deal directly with power plants, Duke Energy,
24 Cinergy, and things like that. We make medium and
25 voltage breakers.

1 It's starting to come into a manufacturing
2 facility. So as time goes on we're increasing
3 production.

4 The breaker itself is just like a house
5 breaker to a certain point, but 30,000 magnitude.

6 Q. Still a lot bigger?

7 A. Yes.

8 Q. What did Square D make at its Middletown
9 facility?

10 A. Low voltage square gear.

11 Q. Have you ever worked for Armco or for AK
12 Steel?

13 A. No.

14 Q. Do you have a driver's license today?

15 A. Yes, I do.

16 Q. Did you have a valid driver's license in
17 September of 2001?

18 A. Yes, I did.

19 Q. Do you have -- have you ever been
20 convicted of any crime?

21 A. No.

22 Q. Have you ever been arrested?

23 A. No.

24 Q. Do you have any sort of medical
25 restrictions on your ability to do work?

1 A. No, I don't.

2 Q. Did you in September 2001?

3 A. No.

4 Q. Have you ever declared bankruptcy?

5 A. No.

6 Q. Have you ever been a plaintiff or a
7 defendant in a lawsuit?

8 A. No.

9 Q. I notice that last week the treasurer of
10 Butler County, Ohio filed a complaint for foreclosure
11 of lien for delinquent real estate taxes concerning
12 you. Are you aware of that?

13 A. Yes, I am. And at the time of this
14 process I got my 401(k) where I put in for a hardship
15 loan that's going to take care of that. Paperwork is
16 in process. And that is on rental property.

17 (Deposition Exhibit 1 was marked for
18 identification.)

19 Q. I've handed you Deposition Exhibit 1. Is
20 this the complaint for foreclosure that we've just
21 been referencing here in your deposition?

22 A. Now, I have not received this document,
23 no.

24 Q. Have you ever seen this document before?

25 A. No.

1 Q. You said that the 1505 Daniel Court
2 address was your residence address.

3 A. Yes, it is.

4 Q. Are you married?

5 A. Yes, I am.

6 Q. Is Melinda Greenwood your wife?

7 A. Yes, she is.

8 Q. How long have you been married?

9 A. 15 years.

10 Q. Is Melinda your first wife?

11 A. Yes.

12 Q. Do you have any children?

13 A. Yes.

14 Q. How many?

15 A. I have four total, two with Melinda.

16 Q. How old are your children with Melinda?

17 A. 14 and 9.

18 Q. How old are the other two children?

19 A. 22 and 21.

20 Q. How many times have you applied for
21 employment at AK Steel?

22 A. Just one time.

23 (Deposition Exhibit 2 was marked for
24 identification.)

25 Q. I've handed you a document that we've

1 marked as Deposition Exhibit 2. Would you take a
2 moment to look through it?

3 A. Okay.

4 Q. Is this the job application that you
5 completed with AK Steel?

6 A. Yes.

7 Q. Is that your handwriting on this document?

8 A. Yes, it is.

9 Q. The information that's within Deposition
10 Exhibit 2, was it accurate at the time that you wrote
11 it out?

12 A. Yes.

13 Q. Which job were you applying for?

14 A. I was applying for just regular in the
15 plant work.

16 Q. Why did you want to leave Square D after
17 more than 20 years of employment there?

18 A. Well, Square D closed the Middletown
19 facility.

20 Q. When?

21 A. And at that point everybody was losing
22 their jobs. And what transpired later on after
23 contract talks with the union, they said they were
24 going to take 100 to go to Oxford, Ohio. We had 385
25 employees at that time.

1 They never had said at that point who the
2 100 was that was going to get to go. So I just took
3 it upon myself that, not knowing if I'm going to have
4 a job tomorrow, that I need to go in and try to find
5 something.

6 And at that point in my career the only
7 place to work would be AK Steel to be equivalent to
8 what I make.

9 Q. When did the Square D plant close in
10 Middletown?

11 A. I would say 2001.

12 Q. How long have you worked -- you said you
13 worked at West Chester for three years?

14 A. I went to Oxford for one year.

15 Q. You did. Okay. The odd thing that struck
16 me about Deposition Exhibit 2 is that you applied on
17 September 12, 2001, the day after 9/11.

18 A. That's when they had AK Steel come in. We
19 done all our -- they had more like a seminar. They
20 had other facilities come in and fill out
21 applications.

22 What it is, they knew we were losing our
23 jobs, so they brought people in. So I don't know
24 nothing about 9/11.

25 Q. So AK Steel came to Square D seeking to

1 hire various of its employees?

2 A. Yes. Or filling out applications.

3 Q. Do you know who from AK came out?

4 A. No, I don't.

5 Q. Do you know whether it was someone from AK
6 or whether it was someone from the State of Ohio
7 Bureau of Employment Services?

8 A. I couldn't tell you. They were
9 representatives for AK. As to the people, I didn't
10 take notice to fill out the application.

11 (Deposition Exhibit 3 was marked for
12 identification.)

13 Q. I'm handing you Deposition Exhibit 3. Is
14 the writing on Deposition Exhibit 3 your writing?

15 A. That is my print, yes.

16 Q. The bottom question says, "Position for
17 which you are applying." And you checked management
18 to technical.

19 A. Okay.

20 Q. Is that correct?

21 A. I see a check there but --

22 Q. But what?

23 A. I'm not sure if I put that or not. But
24 like I say, that is my signature, my print.

25 Q. Are those the jobs that you were seeking

1 when you filled out this application on September 12
2 of 2001?

3 A. Per my profession, I think that's what I
4 would have put down.

5 Q. Were you seeking to become an entry level
6 laborer, a union job at the mill?

7 A. Yes.

8 Q. Is there any reason why you didn't check
9 the job "laborer"?

10 A. What do you mean by that?

11 Q. There's eight different jobs you can apply
12 for on Deposition Exhibit 3, one of which is laborer.
13 Why didn't you check the laborer box?

14 A. I don't know.

15 Q. What happened with regard to AK Steel
16 after you filled out this application at Square D?

17 A. AK, they -- they didn't call me. So I
18 think I made a call to them and asked them about my
19 application.

20 Q. Okay. Do you know who you called?

21 A. Jessica Hicks.

22 Q. Okay.

23 A. And I asked her about my application. And
24 she said, well, we're still sorting through
25 applications, so and so. I think I kind of talked to

1 her about my resume and she said okay. And I think
2 she set me up for a test at that point.

3 Q. How long -- do you know how long after
4 September 12, 2001 this conversation was with
5 Ms. Hicks?

6 A. No, I don't.

7 Q. Was it within two or three weeks, two or
8 three months, two or three years?

9 A. I would think it would have to be at least
10 between three weeks to a month because -- I have
11 heard one or two people within the facility taking
12 the test.

13 Q. What happened next with regard to applying
14 for employment at AK Steel after you talked to
15 Ms. Hicks?

16 A. I went in to take the test.

17 Q. Did you take the test actually at AK
18 Steel?

19 A. Yes, I did.

20 Q. What happened after you took the test?

21 A. Well, nothing at first. And then after
22 maybe about, say a month and a half, two months, I
23 called Jessica back and talked to her and told her
24 that I was calling about my test that I had taken.
25 And she says, well, Mr. Greenwood, if we didn't call

1 you, you didn't pass the test.

2 And when she said that it -- it kind of
3 shook me, for her saying -- when she said me being in
4 my position not to pass the test, it kind of hit me.

5 Then the next -- between the next day or
6 two at work, I think I called her back. And then I
7 kind of explained. And I told her about my resume
8 and my qualifications. Then she said, well, I think
9 what you would have to do or I would recommend you do
10 is talk to the professional band of the job hiring.

11 Q. And did you?

12 A. No.

13 Q. Why not?

14 A. Well, the thing about it -- as time went
15 on that I found out that being with Square D I was
16 going to be one of the 100 to go to Oxford, which was
17 a blessing. So I just didn't further pursue, you
18 know.

19 And the thing about it is, you know, a lot
20 of my peers knew I took the test and I didn't pass,
21 so I don't know, I guess I felt bad about it.

22 Q. How did your peers know that you had not
23 passed the test?

24 A. Because I wasn't going there to work. And
25 I told them I took the test and everything. They

1 were, didn't they call you? No.

2 So it just -- like I said, once I found
3 out that I was going to be able to transfer to the
4 Oxford facility, I just didn't worry about it.

5 Q. Do you have any reason to believe that
6 your race, African American, had anything to do with
7 AK Steel's decision not to hire you?

8 MR. JOHNSON: Object to the form. You may
9 answer. You can answer.

10 A. Not at first.

11 Q. Did you --

12 A. Or, no. The thing about it is, I try to
13 keep an open mind about a lot of things. I don't
14 think race or anything plays in a part where it does
15 but I don't try to perceive it. And they say I
16 didn't pass the test so I took it for that.

17 Q. Do you know of any reason, sitting here
18 today, to believe that AK Steel decided not to hire
19 you because of your race?

20 MR. JOHNSON: Object to the form. You may
21 answer.

22 A. Repeat the question.

23 (The record was read.)

24 A. No.

25 Q. Are you aware that currently AK Steel has

1 locked out all of its hourly employees represented by
2 the Armco Employees Independent Federation?

3 A. Yes, I am.

4 Q. Do you have an interest today in becoming
5 a laborer at AK Steel Middletown Works, employees
6 represented by the AEIF?

7 A. Well, I don't know if a laborer at AK
8 could handle my stature right at this point. Like I
9 say, I'm a manager of eight.

10 Q. That's one of the reasons I asked, yeah.

11 A. But the thing about it, options are open.
12 I grew up in Middletown all my life and AK Steel is
13 the place to work. I mean benefits, money. A lot of
14 their employees have the good things in life in
15 Middletown that a lot of us don't have. So AK Steel
16 was the place to be hired at.

17 Like I said, that was one of the reasons
18 why that if I was going to work for any way in
19 Middletown other than that, I would have to go to AK
20 Steel to supplant my annual salary.

21 Q. Do you want today to be hired by AK Steel
22 to the laborer's job?

23 MR. JOHNSON: Object to the form. Asked
24 and answered. You may answer.

25 A. I'd leave my options open. I wouldn't say

1 no.

2 Q. Would you say yes?

3 A. I would have to think about it, talk to my
4 wife and look at my pros and cons. If it was to my
5 advantage, I would probably do it. I need to get
6 better, not regress.

7 Q. Did you ever file an EEOC charge against
8 AK Steel?

9 A. I don't know what an EEOC is.

10 Q. Did you -- did you ever file a charge of
11 discrimination with any governmental agency
12 concerning AK Steel's decision not the hire you?

13 A. No, I didn't.

14 Q. If I asked this already, I apologize.
15 Have you ever filed bankruptcy?

16 A. No.

17 Q. Do you have any plans to file for
18 bankruptcy?

19 A. No.

20 Q. Have you talked to a bankruptcy attorney
21 in the last six months?

22 A. Never.

23 Q. How is it that you became involved in the
24 lawsuit known as Bert versus AK Steel Corporation?

25 A. I think there was a lot of animosity going

1 on with a lot of the employees at Square D that
2 didn't get a chance to take the test or get hired.
3 And I think that's where I found out that something
4 was going on about not hiring certain people.

5 And I think that's -- that's when it came
6 about. Because I think my brother was included in
7 that but I don't think he ever took the test.

8 Q. Who was your brother?

9 A. His name is Kenneth Greenwood. And he did
10 get laid off from Square D also but I don't think he
11 got a chance to take the test.

12 And then I don't know if my talking to
13 Jessica Hicks and my resume got the chance for me to
14 take the test, because if I wouldn't have called
15 maybe I wouldn't have never got a chance to take it.

16 Q. Do you want to become part of the people
17 who are suing AK Steel in the Bert lawsuit?

18 MR. JOHNSON: Object to the form. You may
19 answer.

20 A. Yes.

21 Q. Why?

22 A. Well, I feel that at this point in time,
23 you know, I lived in Middletown all my life and I
24 know what goes around. And the minority at AK
25 Steel -- AK is very minimum, very minimum. And if

1 there's some way for me to open the doors to make it
2 easier for my brother or my three best friends that
3 tried to get hired at AK that couldn't, I'll help in
4 any way I can to do what I have to do.

5 Q. And if you become part of this lawsuit
6 what is it that you're seeking?

7 A. Satisfaction. Change the test basis. I
8 mean, you know, the thing about it is, the test was
9 behavioral analysis. And I thought it was, you know,
10 what would you do in this situation, or you can have
11 two right answers and if you make the wrong judgment,
12 you're wrong.

13 (Off the record. Cell phone ringing)

14 A. Sorry about that. I usually always do
15 that before I go into any meeting. I think I'm a
16 little nervous. Okay.

17 Q. You were beginning to tell us about the
18 test.

19 A. Like I said, behavioral analysis. I've
20 been involved with the hiring process at Square D and
21 in a similar -- like I say, behavioral analysis, the
22 judgment questions on what do you think in this case
23 or what would you do or which one do you think. And
24 if there's not a right answer, it's not a right
25 answer. You might have two right answers for the

1 same question. But the one you pick might not be the
2 right one to make you pass the test.

3 Q. Let me have a few minutes outside.

4 (A recess was taken from 3:40 to 3:44.)

5 MR. ROGERS: I have no further questions,
6 Mr. Greenwood.

7 EXAMINATION

8 BY MR. JOHNSON:

9 Q. Just a brief follow-up here.

10 Mr. Greenwood, you stated that at the time when you
11 were denied employment at AK Steel that you didn't
12 think race was the reason or was the factor in that
13 denial. Has your opinion changed since then?

14 A. Yes. And why I say that is -- is because
15 when they told me I didn't pass the test, well, then,
16 that's failure on my part. But then when you hire
17 five people that I feel are intellectually inferior
18 to me, I feel there's a problem there.

19 And I wasn't -- like you say, I took the
20 test for laborer. I would have went in that hot
21 strip and did what I had to do. But on the people
22 that they hired -- like I say I can't judge people, I
23 don't -- I don't judge by color. Maybe the five
24 people that they did hire that I felt was less than
25 me knew how to take the test.

1 But, you know, as the time goes by you
2 look at the numbers and you look at the people that I
3 know that took the test and didn't pass the test,
4 there is a little problem there.

5 Q. The five people you're speaking of who got
6 hired, who are these five people?

7 A. These are people from the Square D
8 facility.

9 Q. Okay. Were these people Caucasian?

10 A. Yes.

11 Q. That's all.

12 FURTHER CROSS-EXAMINATION

13 BY MR. ROGERS:

14 Q. These five Caucasian individuals, do you
15 know whether or not they passed the test?

16 A. They started working, that's all I know.
17 They started working.

18 Q. How do you gauge that they are
19 intellectually inferior to you, these five people?

20 A. And that's a judgment call. Don't get me
21 wrong, I don't -- I don't perceive myself to be
22 better than nobody. But I try my best, you can tell
23 by my resume, to go get education and better myself,
24 where maybe three out of the five just had a high
25 school education.

1 Q. This judgment that these five individuals
2 of which you speak are intellectually inferior, is
3 that your subjective judgment?

4 A. What are you trying to say by my
5 subjective?

6 Q. Do you have any objective proof that these
7 individuals are intellectually inferior to you?

8 A. I'm not going to --

9 Q. This is a subjective judgment you made, is
10 that correct?

11 A. Just my own thought and intuition. My own
12 assumption.

13 Q. Okay.

14 A. Nobody else's.

15 Q. Nothing further.

16 FURTHER EXAMINATION

17 BY MR. JOHNSON:

18 Q. Let me just ask a follow-up. These
19 individuals, what positions did they hold at Square
20 D?

21 A. Paint line. One lady was a second shift
22 wire person, I think, maybe. And down -- I think the
23 other guys work down on the mechanical side down on
24 the brakes and the presses, things like that, more
25 the machinery type.

1 Q. So the person who worked on the paint
2 line, what type of job is that?

3 A. Hang parts.

4 Q. Hanging parts. What exactly is that?

5 A. And unloading parts into a conveyor to
6 send through.

7 Q. Is it more difficult to do the paint line
8 or to be in electrical or an electrician?

9 A. I think the electrical is a little bit
10 more intense.

11 Q. You said some lady worked on second shift?

12 A. Yes.

13 Q. What does she do?

14 A. She was a wire person.

15 Q. What exactly does that job entail?

16 A. The wire person basically will take a wire
17 diagram and wire two numbers. So 2 to 4 to 6 to 8 is
18 a wire sequence. She will take the wire and start it
19 at 2, take it through the complete sequence.

20 Q. Is that job more difficult than being an
21 electrician?

22 A. No, it's not.

23 Q. The other three guys you said worked on
24 the mechanical side?

25 A. Yes, I think so.

1 Q. What exactly were their job
2 responsibilities?

3 A. Shear operator, press brake and hole
4 punch, I think.

5 Q. Are these, like, production line
6 positions?

7 A. They are just manufacturing positions.

8 Q. Manufacturing positions. Were the
9 positions that they -- strike that.

10 The positions that they held, were they
11 more difficult than the electrician position?

12 A. No.

13 Q. No further questions.

14 A. Now --

15 Q. I'm sorry.

16 A. -- to make one complete product -- being
17 in the quality department, to make one complete
18 product you have all the eggs in one basket to make
19 it work to satisfy the customer. So I'm not going to
20 say my job is more important to their job. Without
21 them I wouldn't get to where I need to be.

22 So it takes a complete team to make it
23 happen. Then once it gets to me, it's up to me to
24 make sure it's right for the customer.

25 So I think it takes a little more

1 education to do my end of it but it takes their job
2 just as much to make it happen.

3 Q. Okay. No further questions.

4 MR. ROGERS: No further questions.

5 MR. JOHNSON: Waive.

6 MR. ROGERS: Type that up, Karen.

7 MR. JOHNSON: Yes on copy.

8

9

10 (Signature waived.)

11 -----
JAMES GREENWOOD

12 - - -

13 DEPOSITION CONCLUDED AT 3:50 P.M.

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C E R T I F I C A T E

STATE OF OHIO :
: SS
COUNTY OF CLERMONT :

I, Karen Volk, RPR, the undersigned, a duly qualified and commissioned notary public within and for the State of Ohio, do hereby certify that before the giving of his aforesaid deposition, JAMES GREENWOOD was by me first duly sworn to depose the truth, the whole truth and nothing but the truth; that the foregoing is the deposition given at said time and place by JAMES GREENWOOD; that said deposition was taken in all respects pursuant to stipulations of counsel; that I am neither a relative of nor employee of any of the parties or their counsel, and have no interest whatever in the result of the action; that I am not, nor is the court reporting firm with which I am affiliated, under a contract as defined in Civil Rule 28(D).

IN WITNESS WHEREOF, I hereunto set my hand and official seal of office at Batavia, Ohio, this 5 day of August, 2006.

My commission expires: Karen Volk
September 17, 2007. Notary Public - State of Ohio



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COURT OF COMMON PLEAS
BUTLER COUNTY, OHIO

2006 07 25 13

2006 JUL 13 11:54 AM
CAROLE B. MOSKETTI, TREASURER
Butler County, Ohio
315 High St., 10th Floor
Hamilton, OH 45011

Plaintiff

Case No.:
Judge:

Butler County
Clerk of Court

v.

JAMES E. GREENWOOD
1505 Daniel Court
Middletown, OH 45044

MELINDA A. GREENWOOD
1505 Daniel Court
Middletown, OH 45044

HOUSEHOLD REALTY CORPORATION
577 Lamont Road
Elmhurst, IL 60126

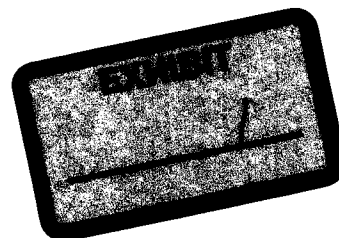
**UNKNOWN HEIRS, DEVISEES,
LEGATEES, EXECUTORS,
ADMINISTRATORS, SPOUSES AND
ASSIGNS, AND THE UNKNOWN
GUARDIAN OF MINOR AND/OR
INCOMPETENT HEIRS, IF ANY, OF THE
ABOVE PERSONS**

Defendant(s)

**COMPLAINT FOR FORECLOSURE
OF LIEN FOR DELINQUENT REAL
ESTATE TAXES: AUDITOR'S
PERMANENT PARCEL NO(S).**

Q6521-035-000-013

1. Plaintiff Carole B. Moschetti is the duly elected and serving Treasurer of Butler County, Ohio. This is an action to foreclose on the lien of the State of Ohio for delinquent land taxes, assessments, charges, penalties, and interest in accordance with R.C. §§5721.01, 5721.28 or 323.25.
2. Defendant(s) James E. Greenwood and Melinda A. Greenwood is/are the fee simple owner(s) of the property described in the attached Exhibit A. The Auditor of Butler County has assigned the following Permanent Parcel Number(s) to said property: Q6521-035-000-013.
3. Pursuant to the provisions of R.C. §5721.13, the Butler County Auditor did, on December 31, 2005, file with the Prosecuting Attorney of Butler County, Ohio, a Delinquent Land Tax Certificate/ Master List of Delinquent Tracts referencing the above described property.
4. Pursuant to said Certificate/Master List, the amount of taxes, assessments, charges, penalties, and interest appearing to be due and unpaid is \$2,683.31.



5. Said taxes are, in fact, due and unpaid, and in accordance with the provisions of R.C. §5721.10, the State of Ohio has a first lien for said amounts.

6. Defendant Household Realty Corporation Assignee of Banc One Financial Services Inc. has/have, or may claim, an interest in said real estate by virtue of an Assignment of Mortgage, filed on 8/14/2000, and recorded in O.R. 6502 Page 1712, in the Records of the Recorder of Butler County, Ohio, assigning the original mortgagee's interest in a certain mortgage recorded at O.R. 6425 Page 1329 of the Records of the Recorder of Butler County, Ohio, in the original amount of \$62,500.00.

7. Upon information and belief, Defendants James E. Greenwood and Melinda A. Greenwood are husband and wife.

8. Pursuant to R.C. §5721.16, Plaintiff further demands payment of all taxes, assessments and interest which are payable on the date of sale.

The undersigned hereby certifies that an examination of the public records of Butler County, Ohio, has been made to determine the ownership of subject real estate and all parties who may claim an interest therein, and that, in the opinion of the undersigned, all parties have been named as parties to this action.

WHEREFORE, Plaintiff requests that, unless the amount found to be a first lien on the herein described premises as set forth above, plus court costs, is paid within an amount of time established by the Court, the Court order that said property be sold by the Sheriff in the manner provided by law for the sale of real estate on execution, and, if unsold, forfeited to the State of Ohio according to R.C. §5723.01.

ROBIN N. PIPER
Prosecuting Attorney of Butler County, Ohio

By *Dan L. Ferguson*
Dan L. Ferguson, 0036957
Assistant Prosecuting Attorney
315 High St., 11th Floor
P.O. Box 515
Hamilton, OH 45012-0515
(513) 887-3478
Fax: (513) 887-3748
fergusondl@butlercountyohio.org

TO THE CLERK:

Please serve Summons and a copy of the Complaint by Certified Mail upon the Defendant(s) at the address(es) as listed in the caption of this Complaint.

ROBIN N. PIPER
Prosecuting Attorney of Butler County, Ohio

By *Dan L. Ferguson*
Dan L. Ferguson, 0036957
Assistant Prosecuting Attorney

EXHIBIT "A"

Parcel 1

2006 07 25 13

Situate in the City of Middletown, Butler County, Ohio and being the South 8.26 feet of Lot Number 5838 and the north 43.02 feet of Lot Number 5839 on the recorded plat of said city.

Subject to such of the easements, restrictions and limitations of record as are now applicable to and effective against said real estate.

APPLICATION FOR EMPLOYMENT

AK Steel Corporation



AK Steel Corporation is an Equal Employment Opportunity Employer and as such meets all government regulations pertaining to Equal Employment Opportunity.

Name JAMES Edward Greenwood Date 9-12-01
FIRST MIDDLE LAST

Present Address 1506 Daniel CT Midd OHIO 45044
NO. STREET CITY STATE ZIP CODE

Phone Number — or number where you can be reached: (513) 422-8276
AREA CODE NUMBER

Permanent Address: SAME AS ABOVE
NO. STREET CITY STATE ZIP CODE

Permanent Phone: () SAME Social Security # 295-66-6527
AREA CODE NUMBER

Are you 18 years of age or older? ☒ Yes ☐ No

Are you lawfully entitled to work within the U.S.? Yes
(PROOF OF CITIZENSHIP OR IMMIGRATION STATUS IS REQUIRED UPON EMPLOYMENT)

Have you been convicted of a crime other than a minor traffic violation? No

If yes, explain. _____

Date available for employment: ASAP

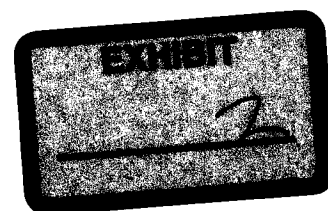
If the job requires, are you willing to travel? Yes Relocate? _____

If the job requires, are you able to work all shifts? Yes

Have you previously applied at Armco or AK Steel? No If yes, when/where? _____

Have you previously worked for Armco or AK Steel? No If yes, when/where? _____

James Edward Greenwood
FIRST MIDDLE LAST NAME



EDUCATIONAL BACKGROUND:

Circle last grade completed												College hours completed				
TYPE OF SCHOOL	NAME AND LOCATION											GRADUATED		DEGREE	FIELD OF STUDY	GRADE POINT/SCALE TOP, MID, BOT. 1/3
												YES	NO			
HIGH	Mid High School											X			Gen	3.25
BUSINESS OR TRADE	D. Russell Lee Career Center											X			ELECT. Wiring	4.0
COLLEGE OR UNIVERSITY	Sinclair Comm. College											X			Quality Tech	3.0
POST GRADUATE																

List other formal educational experience; e.g., night school, home study courses, GED, etc. _____

If presently enrolled, indicate where and field of study: _____

Describe any definite plans for further study: _____

List significant activities, honors, awards or elective offices which have contributed to your career goals and interests: _____

1986 Letter of Commendation (USN) - Good Conduct Award (USN)
 Person who made a difference (SQ-D) National Allie Award (SQ-D)

MILITARY SERVICE: Are you a Veteran of the U.S. Military Service? ☒ Yes ☐ No

BRANCH OF SERVICE	HIGHEST RANK OR RATE
NAVY	EM2 2nd CLASS

Please, indicate any military experience or training you feel might be of interest and value to AK Steel:

Repair Motors & Generators, ELECTRICIAN (AC & DC 120V to 600V
 Circuits

EMPLOYMENT EXPERIENCE:

PRESENT OR MOST RECENT POSITION Started in shop at hourly wage; moved up from there
 Name of employer SQUARE D Company Your title STAFF Tech
 Address 1500 University Blvd Kind of business ELECTRICAL FAB
 Describe your position Quality Dept (TEST Low Voltage Switchgear) Implement ^{Quality} _{Measured}
 Period of employment from 4/87 to present Name of person for whom you worked Randy Mullins Rate of earnings \$47,000/year
 (MO/YR) (MO/YR) (salaried employee)
 Give exact reason for leaving currently employed; became salary in 1989

NEXT PREVIOUS POSITION

Name of employer US NAVY Your title ELECTRICIANS Mate
 Address _____ Kind of business _____
 Describe your position Worked on ALL ELECTRICAL Equip.
 Period of employment from 4/83 to 4/87 Name of person for whom you worked can't recall Rate of earnings E1 → E5
 (MO/YR) (MO/YR) can't recall wages
 Give exact reason for leaving fulfilled service

NEXT PREVIOUS POSITION

Name of employer SQUARE D Company Your title Master Assembler
1500 University Blvd. Middletown, OH 45044
 Address Same AS Above Kind of business Electrical Fab
 Describe your position Assemble Electrical Sifty switches
 Period of employment from 11/77 to 4/83 Name of person for whom you worked TOM EWEN Rate of earnings (1977) \$5.25/hr.
 (MO/YR) (MO/YR) up to \$9.46/hr. (1983)
 Give exact reason for leaving entered military

NEXT PREVIOUS POSITION

Name of employer _____ Your title _____
 Address _____ Kind of business _____
 Describe your position _____
 Period of employment from _____ to _____ Name of person for whom you worked _____ Rate of earnings _____
 (MO/YR) (MO/YR)
 Give exact reason for leaving _____

How much time have you lost from work in the past two years? none

JOB INTERESTS AND SKILLS:

For what particular type of work are you making application; e.g., clerical, technical, engineering, professional, sales, labor, etc.

Technical / Engineering

Expected wage or salary \$ Open

If applying for clerical work, list special skills. Include typing (wpm), word processing, computer software, and any office machines or equipment you can operate:

If applying for sales, technical, professional, or administrative work, give highlights of any special training or experience which may be helpful:

ELECTRIC Motor Rewind, Heating coil Replacement, Basic Steam Cycle AC & DC 120-600 Volt Circuits, Blue print & Schematic Reading
LOCAL Product SAFETY TEAM Member, TRAINEE of ELECTRICAL Inspectors
Write TEST & Inspection procedures, Inspector of Low Voltage
Switchgear

If applying for labor or craft work, indicate any training or experience which might be useful. Include any equipment or machinery you can operate:

Describe any additional qualifications, abilities, or strong points which will help you be successful in the job for which you are applying.

HAVE BEEN in ELECTRICAL Inspection AND TEST for 11 YEARS
with EXCELLENT ELECTRICAL Knowledge, FAMILIAR with The N.E.C
V.L. Procedures, IEEE STANDARDS, Customer Focused

PERSONAL REFERENCES:

Please provide the following information on three individuals whom we may contact as references:

NAME	ADDRESS	TELEPHONE NO	RELATIONSHIP
Howard Mack	3705 Greenwood Dr	(513) 423-2043	Friend
Randy Mullins	5532 Mosiman Rd	(513) 427-1823	Supervisor
Robt. Hill Jr	608 Lincoln St	(513) 422-0157	Friend

I hereby certify that the foregoing information is accurate, and I authorize AK Steel to verify it. I specifically authorize AK Steel Corporation to obtain information from my former employers and other references, and I authorize my former employers and other references to release information to AK Steel Corporation.

I agree that any false or misleading statement in this application for employment or any additional forms signed by me in connection with my employment shall be sufficient cause for refusal or termination of employment.

I understand that this application is not and is not intended to be a contract of employment. I agree to submit to a physical examination applicable to the requirements of the type of work for which I am applying, including drug and alcohol abuse screening.

Signature of Applicant

James E Greenwood Jessica Hicks 11/8/01

Application received by/Date received

Federal regulations require AK Steel Corporation to maintain the following information on all individuals making application for employment. This information is retained separate and apart from all APPLICATIONS FOR EMPLOYMENT and is not used for purposes of making employment decisions. All qualified applicants will receive consideration for employment without regard to race, color, religion, sex, national origin, military status, disability or age. We appreciate your cooperation.

NAME JAMES Greenwood DATE 9-12-01

SEX: ☒ Male ☐ Female

RACE: ☐ White (not of Hispanic origin)
☒ Black (not of Hispanic origin)

☐ Hispanic
☐ American Indian or Alaskan Native

☐ Asian or Pacific Islander

CHECK IF APPLICABLE: ☐ Vietnam Era Veteran ☐ Disabled Veteran ☐ Disabled Individual

POSITION FOR WHICH YOU ARE APPLYING:

☒ Management
☐ Professional

☐ Sales Representative
☒ Technical

☐ Clerical
☐ Craft Worker

☐ Laborer
☐ Service Worker

Form G-6545 12/94 (EMPLOYMENT DEPARTMENT: Detach Upon Receipt of Application)

